



CEQA Referral Initial Study And Notice of Intent to Adopt a Negative Declaration

Date: June 13, 2025

To: Distribution List (See Attachment A)

From: Emily DeAnda, Associate Planner
Planning and Community Development

Subject: USE PERMIT APPLICATION NO. 2025-0011 – COUCO CREEK

Comment Period: June 13, 2025 – July 17, 2025

Respond By: July 17, 2025

Public Hearing Date: Not yet scheduled. A separate notice will be sent to you when a hearing is scheduled.

You may have previously received an Early Consultation Notice regarding this project, and your comments, if provided, were incorporated into the Initial Study. Based on all comments received, Stanislaus County anticipates adopting a Negative Declaration for this project. This referral provides notice of a 30-day comment period during which Responsible and Trustee Agencies and other interested parties may provide comments to this Department regarding our proposal to adopt the Negative Declaration.

All applicable project documents are available for review at: Stanislaus County Department of Planning and Community Development, 1010 10th Street, Suite 3400, Modesto, CA 95354. Please provide any additional comments to the above address or call us at (209) 525-6330 if you have any questions. Thank you.

Applicant: Couco Creek Dairy Biogas, LLC.

Project Location: 3426 South Commons Road and 0 Faith Home Road, between West Harding and Bradbury Roads, in the Turlock area.

APN: 044-039-001 and 044-039-002

Williamson Act Contract: 1976-2290

General Plan: Agriculture

Current Zoning: General Agriculture (A-2-40)

Project Description: Request to establish a biogas pipeline injection site on a 307± acre parcel in the General Agriculture (A-2-40) zoning district. Biogas from an on-site anaerobic dairy digester and two off-site digesters will be trucked to the project site and off-loaded into a Pacific Gas and Electric (PG&E) natural gas pipeline on-site.

Full document with attachments available for viewing at:
<http://www.stancounty.com/planning/pl/act-projects.shtm>



USE PERMIT APPLICATION NO. PLN2025-0011 – COUCO CREEK

Attachment A

Distribution List

X	CA DEPT OF CONSERVATION Land Resources		STAN CO ALUC
X	CA DEPT OF FISH & WILDLIFE		STAN CO ANIMAL SERVICES
	CA DEPT OF FORESTRY (CAL FIRE)	X	STAN CO BUILDING PERMITS DIVISION
	CA DEPT OF TRANSPORTATION DIST 10	X	STAN CO CEO
X	CA OPR STATE CLEARINGHOUSE		STAN CO CSA
X	CA RWQCB CENTRAL VALLEY REGION	X	STAN CO DER
	CA STATE LANDS COMMISSION	X	STAN CO DER: MILK AND DAIRY
	CEMETERY DISTRICT	X	STAN CO FARM BUREAU
	CENTRAL VALLEY FLOOD PROTECTION	X	STAN CO HAZARDOUS MATERIALS
X	COUNTY OF: MERCED		STAN CO PARKS & RECREATION
	COMMUNITY SERVICES DIST:	X	STAN CO PUBLIC WORKS
X	COOPERATIVE EXTENSION	X	STAN CO PUBLIC WORKS - SURVEY
X	DISPOSAL DIST: TURLOCK SCAVENGER AREA 4		STAN CO RISK MANAGEMENT
X	DER GROUNDWATER RESOURCES DIVISION	X	STAN CO SHERIFF
X	FIRE PROTECTION DIST: TURLOCK RURAL	X	STAN CO SUPERVISOR DIST 2: CHIESA
X	GSA: WEST TURLOCK SUBBASIN	X	STAN COUNTY COUNSEL
	HOSPITAL DIST:		StanCOG
X	IRRIGATION DIST: TURLOCK	X	STANISLAUS FIRE PREVENTION BUREAU
X	MOSQUITO DIST: TURLOCK	X	STANISLAUS LAFCO
X	STANISLAUS COUNTY EMERGENCY MEDICAL SERVICES	X	STATE OF CA SWRCB DIVISION OF DRINKING WATER DIST. 10
	MUNICIPAL ADVISORY COUNCIL:	X	SURROUNDING LAND OWNERS
X	PACIFIC GAS & ELECTRIC		INTERESTED PARTIES
	POSTMASTER:	X	TELEPHONE COMPANY: AT&T
X	RAILROAD: UNION PACIFIC		TRIBAL CONTACTS (CA Government Code §65352.3)
X	SAN JOAQUIN VALLEY APCD		US ARMY CORPS OF ENGINEERS
X	SCHOOL DIST 1: CHATOM UNION	X	US FISH & WILDLIFE
X	SCHOOL DIST 2: TURLOCK UNIFIED		US MILITARY (SB 1462) (7 agencies)
	WORKFORCE DEVELOPMENT		USDA NRCS
X	STAN CO AG COMMISSIONER		
	TUOLUMNE RIVER TRUST		

STANISLAUS COUNTY CEQA REFERRAL RESPONSE FORM

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: USE PERMIT APPLICATION NO. PLN2025-0011 – COUCO CREEK

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- _____ Will not have a significant effect on the environment.
- _____ May have a significant effect on the environment.
- _____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

Name	Title	Date



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

CEQA INITIAL STUDY

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text, January 1, 2020

1. **Project title:** Use Permit Application No. PLN2025-0011 – Couco Creek
2. **Lead agency name and address:** Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
3. **Contact person and phone number:** Emily DeAnda, Associate Planner
(209) 525-6330
4. **Project location:** 3426 South Commons Road and 0 Faith Home Road, between West Harding and Bradbury Roads, in the Turlock area (APNs: 044-039-001 and 044-039-002).
5. **Project sponsor's name and address:** Couco Creek Dairy Biogas, LLC.
1730 South Street, Redding, CA 96001
6. **General Plan designation:** Agriculture
7. **Zoning:** General Agriculture (A-2-40)
8. **Description of project:**

Request to establish a biogas pipeline injection site on a 307± acre parcel in the General Agriculture (A-2-40) zoning district. Biogas from an on-site anaerobic dairy digester (Couco Creek Dairy) and two off-site digesters located at Blue Sky Dairy in Atwater, California, and JDS Ranch in Wasco, California, will be trucked to the project site and off-loaded into a Pacific Gas and Electric (PG&E) natural gas pipeline on-site. The equipment to be utilized for the project will be located within a 159± square-foot enclosed metal structure. Existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. Storm drainage is proposed to be maintained on-site. The site is currently planted in forage crops and improved with two lagoons for liquid manure waste storage, and one anaerobic digester that is currently being constructed. The 307± acre project parcel is currently assessed under two Assessor Parcel Numbers (APNs), 044-039-001 and 044-039-002; the project site will be within Parcel -001. The use of the project site for wastewater and nutrient management is currently associated with the dairy facility located across South Commons Road to the east located at 3303 S. Washington Road (APN 044-040-041) which was permitted under Use Permit PLN2018-0043 – Couco Creek Dairy, Inc.
9. **Surrounding land uses and setting:** Fertilizer storage and manufacturing facility to the north; a dairy facility and ranchettes with single-family dwellings to the east; production agriculture to the south; and production agriculture and dairy facilities to the west.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** Stanislaus County Department of Public Works
Department of Environmental Resources – Milk and Dairy Division
11. **Attachments:** I. None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

- ☒ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature on file.

Prepared by Emily DeAnda, Associate Planner

June 13, 2025

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) the significant criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES

I. AESTHETICS – Except as provided in Public Resources Code Section 21099, could the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Discussion: The site itself is not considered to be a scenic resource or unique scenic vista. The only scenic designation in the County is along Interstate 5, which is not near the project site. The surrounding area is comprised of a fertilizer storage and manufacturing facility to the north; a dairy facility and ranchettes with single-family dwellings to the east; production agriculture to the south; and production agriculture and dairy facilities to the west. Buildings in the surrounding area primarily consist of metal, wood, and stucco agricultural and residential buildings. The equipment as part of the proposed project to be utilized for the injection point will be located within a 159± square-foot enclosed metal structure. Aesthetics associated with the project site are not anticipated to change as a result of this project, nor impact aesthetics of the greater surrounding area. No new structures are proposed to be installed on the parcel to the east which contains the primary portion of the dairy facility that will be served by the digester and injection point. Standard conditions of approval will be added to this project to address glare from any on-site lighting. Conditions of approval will be added to the project requiring building permits for the digester and associated equipment and metal structure, to be obtained from the Stanislaus County Building Permits Division, and that all building permits for the proposed structures and equipment be finalized prior to operation.

No adverse impacts to the existing visual character of the site or its surroundings are anticipated.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?			X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

Discussion: The project site is currently enrolled in California Land Conservation Act ("Williamson Act") Contract No. 76-2290 and is classified as "Farmland of Statewide Importance," "Prime Farmland," and "Confined Animal Agriculture" by the California Department of Conservation's Farmland Mapping and Monitoring Program. The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that the project site is primarily comprised of Hilmar loamy sand (HfA), zero to one percent slopes, with a grade of 2 and index rating of 68; Dinuba sandy loam (DrA), zero to one percent slopes with a grade of 1 and index rating of 86; and Dinuba sandy loamy (DwA), slightly saline-alkali, zero to one percent slopes, with a grade of 2 and an index rating of 68. The California Revised Storie Index is a rating system based on soil properties that dictate the potential for soils to be used for irrigated agricultural production in California. This rating system grades soils with an index rating of 68 as good and 86 as excellent. Stanislaus County considers land that meets at least one of the following requirements to be prime farmland under the Uniform Rules: parcels comprised of Grade 1 or 2 soils; irrigated pastureland which supports livestock used for the production of food and fiber; and land used for unprocessed agricultural plant production with an annual gross value of not less than eight hundred dollars per acre. The project site meets the definition of prime farmland under the County's Uniform Rules as the parcel is used as part of a dairy facility and planted in forage crops. The proposed project will not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The project has a General Plan designation of Agriculture and zoning designation of General Agriculture with a 40-acre minimum (A-2-40) which allows dairies as a permitted agricultural use, unless a dairy is expanding and a new or modified permit, waiver, order, or waste discharge requirement is needed from the Regional Water Quality Control Board. In this case the dairies included in the project are existing and are not proposed to be expanded. The use of a covered digester and equipment to process dairy manure is considered to be an accessory use if it is serving the on-site dairy and no herd expansion is proposed. However, in this case, the proposed project includes the operation of an injection point for the on-site dairy use and for use by two off-site dairies. Due to the use of the injection hub for multiple dairies, discretionary approval is required to permit the operation as a Tier Two Use Permit. Within the A-2 zoning district, the County has determined that certain uses related to agricultural production are “necessary for a healthy agricultural economy.” The County allows agriculture service operations and processing plants and facilities by obtaining a Tier Two Use Permit if specific criteria can be met and if specific findings can be made. Those findings include that the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity; that the use is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage; and that it will not create a concentration of commercial and industrial uses in the vicinity. There are limits to the number of employees that are involved in the operation under a Tier Two Use Permit; no more than ten full-time employees, or 20 seasonal employees are permitted to be involved in the operation. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County. The project will not create a concentration of commercial or industrial uses in the vicinity and does not appear to be detrimental to the health, safety, and general welfare of persons and property within the area. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. Existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project.

County Code Section 21.20.045, in compliance with Government Code Section 51238.1, specifies that uses approved on contracted lands shall be consistent with three principles of compatibility. Those principles state that the proposed use shall not significantly compromise, displace, impair, or remove current or reasonably foreseeable agricultural operations on the subject contracted parcel(s) or on other contracted lands in the A-2 zoning district. The project as proposed is considered a Tier Two use. Within the A-2 zoning district, the County has determined Tier Two uses shall be evaluated on a case-by-case basis by the Planning Commission and/or Board of Supervisors to determine whether they are consistent with the principles of compatibility set forth in Section 21.20.045 of the County Code. During project review, this application was referred to the Department of Conservation (DOC) for review and input and no response has been received to date.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2-40) zoning district and are required to be designed to physically avoid conflicts between agricultural and non-agricultural uses. General Plan Amendment No. 2011-01 – *Revised Agricultural Buffers* was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. The use of a dairy is included in the Agricultural Element’s definition of “Agriculture” and considered to be permitted agricultural uses and not subject to agricultural buffer requirements. As this is a Tier Two use, if not considered people-intensive by the Planning Commission, the proposed project will also not be subject to agricultural buffers. As mentioned previously, existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. Therefore, staff believes the project can be considered low people-intensive, thus not subject to the County’s Agricultural Buffer requirements.

The project site is located within the boundaries of the Turlock Irrigation District (TID). The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities

on the project site be subject to the District's approval; and that all applicable electrical requirements be adhered to pursuant to the District's standards. TID's comments will be addressed as conditions of approval for the project.

The surrounding area is comprised of a fertilizer storage and manufacturing facility to the north; a dairy facility and ranchettes with single-family dwellings to the east; production agriculture to the south; and production agriculture and dairy facilities to the west. The project site will continue to operate as accessory to the dairy located across South Commons Road and the proposed injection hub is not anticipated to conflict with the ongoing agricultural use of the site or surrounding properties. The request is not expected to cause the conversion of farmland to non-agriculture use.

Based on the specific features and design of this project, it does not appear this project will impact the long-term productive agricultural capability of surrounding contracted lands in the A-2 zoning district. There is no indication this project will result in the removal of adjacent contracted land from agricultural use. No forest lands exist in Stanislaus County. The project will have less than significant impacts to Agriculture and Forest Resources.

Mitigation: None.

References: Application information; United States Department of Agriculture NRCS Web Soil Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2022; Referral response from Turlock Irrigation District (TID), dated March 25, 2025; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those odors adversely affecting a substantial number of people?			X	

Discussion: The proposed project is located within the San Joaquin Valley Air Basin (SJVAB) and, therefore, falls under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). In conjunction with the Stanislaus Council of Governments (StanCOG), the SJVAPCD is responsible for formulating and implementing air pollution control strategies. The SJVAPCD's most recent air quality plans are the 2007 PM₁₀ (respirable particulate matter) Maintenance Plan, the 2008 PM_{2.5} (fine particulate matter) Plan, and the 2007 Ozone Plan. These plans establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the SJVAB, which has been classified as "extreme non-attainment" for ozone, "attainment" for respirable particulate matter (PM-10), and "non-attainment" for PM 2.5, as defined by the Federal Clean Air Act.

The project proposes to establish a biogas pipeline injection site on a 307± acre parcel in the General Agriculture (A-2-40) zoning district. Biogas from an on-site anaerobic dairy digester (Couco Creek Dairy) and two off-site digesters located at Blue Sky Dairy in Atwater, California, and JDS Ranch in Wasco, California, will be trucked to the project site and off-loaded into a PG&E natural gas pipeline on-site. Existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. The pipelines the methane will be injected to are existing within the County Right-of Way (ROW) and are owned by PG&E.

The primary source of air pollutants generated by this project would be classified as being generated from "mobile" sources. Mobile sources would generally include dust from roads, farming, and automobile exhausts. Mobile sources are generally regulated by the Air Resources Board of the California EPA which sets emissions for vehicles and acts on issues regarding cleaner burning fuels and alternative fuel technologies. As such, the District has addressed most criteria air pollutants through basin wide programs and policies to prevent cumulative deterioration of air quality within the Basin. The injection hub will not require additional employees.

As required by CEQA Guidelines Section 15064.3, potential impacts regarding Air Quality should be evaluated using Vehicle Miles Traveled (VMT). Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. The CEQA Guidelines identify vehicle miles traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. According to the same technical advisory from OPR, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less-than significant transportation impact. The proposed project will not exceed the screening criteria for VMT analysis with a total of 12 roundtrips (up to six truck trips traveling to and from the injection site) for off-loading of biogas per-day. As this is below the District's threshold of significance for vehicle and heavy truck trips, no significant impacts from vehicle and truck trips to air quality are anticipated.

Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations within a project's vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces. Construction activities associated with the proposed project for the equipment installation on-site may require use of heavy-duty construction equipment. However, all construction activities will occur in compliance with all SJVAPCD regulations; therefore, construction emissions are anticipated to be less than significant without mitigation.

The project was referred to the San Joaquin Valley Air Pollution Control District (SJVAPCD) as part of the Early Consultation prepared for the proposed project; however, no response was received.

As the project must comply with District regulations, the project's emissions would be less than significant for all criteria pollutants, would not be inconsistent with any applicable air quality attainment plans, and would result in less than significant impacts to air quality.

Mitigation: None.

References: Application information; Governor's Office of Planning and Research Technical Advisory, December 2018; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Stanislaus County General Plan and Support Documentation¹.

IV. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

Discussion: The project site is located within the Hatch Quad of the California Natural Diversity Database. There are seven species which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern, or listed as on a watch list within this quad. These species include Swainson's hawk, cackling goose, tricolored blackbird, green sturgeon – southern DPS, steelhead – Central Valley DPS, northwestern pond turtle, and California alkali grass. There are no reported sitings of any of the aforementioned species on the project site or within a 2-mile radius of the project site. Additionally, there is a very low likelihood that these species are present on the project site as it has already been disturbed for agricultural purposes and developed with various wastewater ponds for the dairy facility. The proposed project will take place on the northeastern portion of the parcel immediately south of the area that is currently developed with an existing wastewater pond.

An Early Consultation was referred to the California Department of Fish and Wildlife and United States Fish and Wildlife Service with no response received from either agency. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

Mitigation: None.

References: Application information; California Department of Fish and Wildlife's Natural Diversity Database Quad Species List; California Natural Diversity Database, Planning and Community Development GIS, accessed May 12, 2025; Stanislaus County General Plan and Support Documentation¹.

V. CULTURAL RESOURCES -- Would the project:				
	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Discussion: As this project is not a General Plan Amendment it was not referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. It does not appear this project will result in significant impacts to any archaeological or cultural resources. The project site has already been disturbed and planted in forage crops and improved with two lagoons for liquid manure waste storage, and one anaerobic digester that is currently being constructed. As part of this request, biogas from an on-site anaerobic dairy digester (Couco Creek Dairy) and two off-site digesters located at Blue Sky Dairy in Atwater, California, and JDS Ranch in Wasco, California, will be trucked to the project site and off-loaded into a PG&E natural gas pipeline on-site. The equipment to be utilized for the project will be located within a 159± square-foot enclosed metal structure.

Conditions of approval will be placed on the project, requiring that any construction activities shall be halted, if any resources are found, until appropriate agencies are contacted, and an archaeological survey is completed.

No significant impacts to cultural resources are anticipated to occur as a result of this project.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

VI. ENERGY -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion: The California Environmental Quality Act (CEQA) Guidelines Appendix F states that energy consuming equipment and processes, which will be used during construction or operation such as: energy requirements of the project by fuel type and end use, energy conservation equipment and design features, energy supplies that would serve the project, total estimated daily vehicle trips to be generated by the project, and the additional energy consumed per trip by mode, shall be taken into consideration when evaluating energy impacts. Additionally, the project's compliance with applicable state or local energy legislation, policies, and standards must be considered.

A response was received from the Turlock Irrigation District (TID) for the project requiring that the developer comply with all applicable electrical requirements pursuant to the District's standards. No environmental concerns or issues related to energy supply were raised. Conditions of approval reflecting TID's comments will be added to the project.

Energy consuming equipment and processes include construction equipment, trucks, and the employee vehicle. As discussed in Section III – Air Quality, these activities would not significantly increase Vehicle Miles Traveled (VMT), due to the number of vehicle trips not exceeding a total of 110 vehicle trips per-day. There will be a maximum total of 12 roundtrip truck trips per-day traveling to and from the project site for off-loading biogas into the injection point. The trucks and equipment are the main consumers of energy associated with this project but will be subject to applicable Air District regulations, including rules and regulations that increase energy efficiency. Consequently, emissions would be minimal. Therefore, consumption of energy resources would be less than significant without mitigation for the proposed project.

The project was referred to the San Joaquin Valley Air Pollution Control District (SJVAPCD) as part of the Early Consultation prepared for the proposed project; however, no response was received.

The proposed structures and any on-site lighting related to the equipment are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental

quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). Conditions of approval will be added to the project requiring the building permit(s) for the digester (BLD2023-2414) and equipment to be obtained from the Stanislaus County Building Permits Division prior to operation.

It does not appear that this project will result in significant impacts to the wasteful, inefficient, or unnecessary consumption of energy resources. Accordingly, the potential impacts to Energy are considered to be less than significant.

Mitigation: None.

References: Application information; CEQA Guidelines; Referral response from Turlock Irrigation District, dated March 25, 2025; San Joaquin Valley Air Pollution Control District – Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Governor's Office of Planning and Research Technical Advisory, December 2018; Title 16 of County Code; CA Building Code; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

VII. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Discussion: The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that the parcel is primarily comprised of Hilmar loamy sand (HfA), Dinuba sandy loam (DrA), and Dinuba sandy loamy (DwA). As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County

subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. Any structures resulting from this project will be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed. No expansion of a septic tank or alternative wastewater disposal system is proposed; however, if any future request is submitted for these, they would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements. DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. A building permit for the existing digester was reviewed and approved by DER, Public Works and the Building Permits Division. Building permits for the electrical upgrades and foundation for the equipment associated with the injection site have been applied for but will not be issued unless the request is approved for the Use Permit. The project was referred to the Department of Environmental Resources (DER) which provided a response to the project requiring that prior to issuance of a building permit or licenses to conduct business, the property owner shall submit certifications to DER that the property use does not constitute a public water system, and that prior to issuance of any grading or building permit, the applicant(s) shall submit a site plan showing the location of all water wells, in addition to the layout and design of both existing and proposed on-site wastewater treatment systems, including areas designated for future 100% expansion or replacement. Any proposed work to an existing or proposed on-site wastewater treatment systems shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks and be designed according to type and/or maximum occupancy of the proposed structure to the estimate waste/sewage design flow rate. Conditions of approval regarding DER and Public Works' standards will be applied to the project and will be required to be met prior to issuance of a building permit associated with this request.

The project site is not located near an active fault or within a high earthquake zone. Landslides are not likely due to the flat terrain of the area. Impacts to Geology and Soils are anticipated to be less than significant.

Mitigation: None.

References: Application information; United States Department of Agriculture NRCS Web Soil Survey; Referral response from the Department of Environmental Resources (DER) – Environmental Health Division, dated April 8, 2025; Stanislaus County General Plan and Support Documentation¹.

VIII. GREENHOUSE GAS EMISSIONS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Discussion: The principal Greenhouse Gasses (GHGs) are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] No. 32), which requires the California Air Resources Board (ARB) design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. Two additional bills, SB 350 and SB32, were passed in 2015 further amending the states Renewables Portfolio Standard (RPS) for electrical generation and amending the reduction targets to 40 percent of 1990 levels by 2030.

The short-term emissions of GHGs during construction, primarily composed of CO₂, CH₄, and N₂O, would be the result of fuel combustion by construction equipment and motor vehicles. The other primary GHGs (HFCs, PFCs, and SF₆) are

typically associated with specific industrial sources and are not expected to be emitted by future construction at this project site. As described above in Section III - *Air Quality*, the use of heavy-duty construction equipment would be very limited; therefore, the emissions of CO₂ from future construction would be less than significant. Additionally, the construction of the digester and associated injection equipment and structure are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures, of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11) which includes minimum statewide standards to significantly reduce GHG emissions from new construction. Construction activities associated with this project are considered to be less than significant as they are temporary in nature and are subject to meeting San Joaquin Valley Air Pollution Control District (SJVAPCD) standards for emissions.

Direct emissions of GHGs from the operation of the proposed project are primarily due to the truck trips transporting methane to the project site, and by the operation of the equipment. As required by California Environmental Quality Act (CEQA) Guidelines section 15064.3, potential impacts regarding Green House Gas Emissions should be evaluated using Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks multiplied by the distance traveled by each car/truck. Total vehicle trips as a result of this project will not exceed 110 trips per-day. As discussed in Section III – *Air Quality*, the proposed project will generate a total of 12 one-way truck trips per-day. The operation of the injection hub is anticipated to have a net reduction of GHGs as the methane captured by the digesters and ultimately injected into the PG&E pipeline will be used as natural gas.

This project was referred to the San Joaquin Valley Air Pollution Control District (Air District); however, no response has been received to date. Staff will include a condition of approval requiring the applicant to comply with all appropriate District rules and regulations regarding the operation of the digester and associated equipment on the project site. Consequently, GHG emissions associated with this project are considered to be less than significant.

Mitigation: None.

References: Application information; Governor's Office of Planning and Research Technical Advisory, December 2018; Stanislaus County General Plan and Support Documentation¹.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Discussion: The County Department of Environmental Resources (DER) is responsible for overseeing hazardous materials. A referral response from the Hazardous Materials Division of the Stanislaus County Department of Environmental Resources (DER) is requiring the applicant to contact the Department regarding appropriate permitting requirements for hazardous materials and/or wastes. The applicant is required to use, store, and dispose of any hazardous materials in accordance with all applicable federal, state, and local regulations. The Hazardous Materials Division also requested that the developer conduct a Phase I or Phase II study prior to the issuance of a grading or building permit. Additionally, the Hazardous Materials Division requested that they be contacted should any underground storage tanks, buried chemicals, buried refuse, or contaminated soil be discovered during grading or construction. The applicant will also be required to contact the Hazardous Materials Division for information regarding regulatory requirements for hazardous materials and/or wastes. These comments will be reflected through the application of a condition of approval. A referral response was also received from the Environmental Health Division of the DER requiring that prior to issuance of any grading or building permit, the applicant(s) shall submit a site plan showing the location of all water wells, in addition to the layout and design of both existing and proposed on-site wastewater treatment systems, including areas designated for future 100% expansion or replacement. Any proposed work to an existing or proposed on-site wastewater treatment systems shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks and be designed according to type and/or maximum occupancy of the proposed structure to the estimate waste/sewage design flow rate. Conditions of approval regarding DER and Public Works' standards will be applied to the project and will be required to be met prior to issuance of a building permit associated with this request.

Animal waste resulting from daily operations will be managed through Waste and Nutrient Management Plans, which were reviewed by the Central Valley Regional Water Quality Control Board (CVRWQCB). The project was referred to Regional Water; however, no comment specific to the waste to be processed on-site was received. The project as proposed will be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) as the proposal will disturb one or more acres of soil. A condition of approval will be placed on the project reflecting Regional Water's comment regarding the Construction General Permit and that the applicant contact Regional Water in order to comply with any rules and regulations or to obtain any applicable permits from their department; or for any amendments required for the WMPs or NMPs of the associated dairies.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater from drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. Additionally, agricultural buffers are intended to reduce the risk of spray exposure to surrounding people.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2-40) zoning district and are required to be designed to physically avoid conflicts between agricultural and non-agricultural uses. General Plan Amendment No. 2011-01 – *Revised Agricultural Buffers* was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. The use of a dairy is included in the Agricultural Element's definition of "Agriculture" and considered to be permitted agricultural uses and not subject to agricultural buffer requirements. As this is a Tier Two use, if not considered people-intensive by the Planning Commission, the proposed project will also not be subject to agricultural buffers. As mentioned previously, existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. Therefore, staff believes the project can be considered low people-intensive, thus not subject to the County's Agricultural Buffer requirements.

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by

Turlock Rural Fire Protection District. The project was referred to the District, and no comments have been received to date. The project site is not within the vicinity of any airstrip or wildlands.

No significant impacts associated with hazards or hazardous materials are anticipated to occur as a result of the proposed project.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER) – Environmental Health Division, dated April 8, 2025; Referral response from Central Valley Regional Water Quality Control Board, dated April 10, 2025; Stanislaus County General Plan and Support Documentation¹.

X. HYDROLOGY AND WATER QUALITY -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or off-site.			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Discussion: Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2 percent annual chance floodplains. The project proposes to handle stormwater drainage overland. The building permit for the digester (BLD2023-2414) was reviewed and approved by DER, Public Works and the Building Permits Division. DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. Accordingly, runoff associated with the construction at the proposed project site was reviewed as part of the grading review process for BLD2023-2414 and required to be maintained on-site. Additionally, any construction reviewed under the Building Permit process must be reviewed and approved by the Department of Environmental Resources (DER) and adhere to current Local Agency Management Program (LAMP) standards. LAMP standards include minimum setback from wells to prevent negative impacts to groundwater quality. No new wells or septic systems are proposed as part of this

request. Any future new wells constructed on-site will be subject to review under the County's Well Permitting Program, which will determine whether a new well will require environmental review. The project was referred to the Department of Environmental Resources (DER) which provided a response to the project requiring that prior to issuance of a building permit or licenses to conduct business, the property owner shall submit certifications to DER that the property use does not constitute a public water system, and that prior to issuance of any grading or building permit, the applicant(s) shall submit a site plan showing the location of all water wells, in addition to the layout and design of both existing and proposed on-site wastewater treatment systems, including areas designated for future 100% expansion or replacement. Building permits for the electrical upgrades and foundation for the equipment associated with the injection site have been applied for but will not be issued unless the request is approved for the Use Permit. Conditions of approval regarding DER and Public Works' standards will be applied to the project and will be required to be met prior to issuance of a building permit associated with this request.

The primary regulatory program for implementing water quality standards is the federal National Pollutant Discharge Elimination System (NPDES) Program. The United States Environmental Protection Agency (EPA) has delegated NPDES enforcement and administration to the State of California Regional Water Quality Control Board (RWQCB). The Central Valley RWQCB (Regional Water) administers the federal NPDES program for dairies within Stanislaus County. Regional Water adopted the Reissued Waste Discharge Requirements General Order for Existing Milk Cow Dairies, Order R5-2013-0122 (Reissued General Order) on October 3, 2013. The Reissued General Order specifies design standards for covered anaerobic digesters. The proposed digester will be required to comply with the specifications and design standards as specified under the Reissued General Order. Confined Animal Facility Operations (CAFO) with 700 or more mature dairy cows are required to prepare and implement a Nutrient Management Plan (NMP) and Waste Management Plan (WMP) which describe the regulatory requirements for the facility, and together they serve as the primary tool to prevent groundwater contamination and to establish best management practices (BMP) for dairy waste management. No expansion of existing herd sizes will occur as a result of this project on any of the dairies associated with the use of the proposed digester; however, the WMPs and NMPs of the dairies utilizing the digester may be required to be amended to make facility modifications as necessary to protect surface water, improve storage capacity, and improve the facilities nitrogen balances before all infrastructure changes are completed. In addition, BMPs intended to minimize surface water discharges and subsurface discharges at dairies are required. A condition of approval will be added to the project requiring the applicant and associated dairies to comply with all applicable rules, regulations and design standards Regional Water may require of the project in order to address ground water quality.

The project was referred to Regional Water which requires the project as proposed to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) as the proposal will disturb one or more acres of soil. A condition of approval will be placed on the project that reflect Regional Water's comments and require that the applicant contact Regional Water in order to apply for and obtain any applicable permits from their department.

The Sustainable Groundwater Management Act (SGMA) was passed in 2014 with the goal of ensuring the long-term sustainable management of California's groundwater resources. SGMA requires agencies throughout California to meet certain requirements including forming Groundwater Sustainability Agencies (GSA), developing Groundwater Sustainability Plans (GSP), and achieving balanced groundwater levels within 20 years. Stanislaus County is a participating member in five GSAs across four groundwater subbasins, including: the Eastern San Joaquin Groundwater Subbasin, which covers a portion of Stanislaus County occurring north of the Stanislaus River; commonly referred to as the "northern triangle"; the Modesto Groundwater Subbasin, which covers an area of land located between the Stanislaus and Tuolumne rivers, occurring west of the Sierra Nevada foothills and east of the San Joaquin River; the East Turlock Groundwater Subbasin which covers an area of land located between the Tuolumne and Merced rivers, occurring west of the Sierra Nevada Foothills; the West Turlock Groundwater Subbasin, which covers an area of land located between the Tuolumne and Merced rivers, occurring east of the San Joaquin River; and the Delta-Mendota Groundwater Subbasin which covers an area of land within Stanislaus County located west of the San Joaquin River and east of the basement rock of the Coast Range. Public and private water agencies and user groups within each of the four groundwater subbasins work together as GSAs to implement SGMA. The project site is located in the West Turlock Subbasin GSA.

The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval; and that all

applicable electrical requirements be adhered to pursuant to the District's standards. TID's comments will be addressed as conditions of approval for the project.

As a result of the conditions of approval required for this project, impacts associated with drainage, water quality, and runoff are expected to have a less than significant impact.

Mitigation: None.

References: Application information; Referral response from the Department of Environmental Resources (DER) – Environmental Health Division, dated April 8, 2025; Local Agency Management Program (LAMP) for Stanislaus County DER; Reissued Waste Discharge Requirements General Order for Existing Milk Cow Dairies, Order R5-2013-0122 (Reissued General Order), October 3, 2013; Referral response from the Central Valley Water Quality Control Board, dated April 10, 2025; Sustainable Groundwater Management Act; Stanislaus County Code Title 9 Chapter 9.37 Groundwater; Referral response from TID, dated March 25, 2025; Stanislaus County General Plan and Support Documentation¹.

XI. LAND USE AND PLANNING -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Physically divide an established community?			X	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

Discussion: The project has a General Plan designation of Agriculture and zoning designation of General Agriculture with a 40-acre minimum (A-2-40) which allows dairies as a permitted agricultural use, unless a dairy is expanding and a new or modified permit, waiver, order, or waste discharge requirement is needed from the Regional Water Quality Control Board. In this case the dairies included in the project are existing and are not proposed to be expanded.

The use of a covered digester and equipment to process dairy manure is considered to be an accessory use if it is serving the on-site dairy and no herd expansion is proposed. However, in this case, the proposed project includes the operation of an injection point for the on-site dairy use and for use by two off-site dairies. Due to the use of the injection hub for multiple dairies, discretionary approval is required to permit the operation as a Tier Two Use Permit. Within the A-2 zoning district, the County has determined that certain uses related to agricultural production are "necessary for a healthy agricultural economy." The County allows agriculture service operations and processing plants and facilities by obtaining a Tier Two Use Permit if specific criteria can be met and if specific findings can be made. Those findings include that the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity; that the use is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage; and that it will not create a concentration of commercial and industrial uses in the vicinity. There are limits to the number of employees that are involved in the operation under a Tier Two Use Permit; no more than ten full-time employees, or 20 seasonal employees are permitted to be involved in the operation. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County. The project will not create a concentration of commercial or industrial uses in the vicinity and does not appear to be detrimental to the health, safety, and general welfare of persons and property within the area. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. Existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project.

The project site is currently enrolled in California Land Conservation Act ("Williamson Act") Contract No. 76-2290. County Code Section 21.20.045, in compliance with Government Code Section 51238.1, specifies that uses approved on contracted lands shall be consistent with three principles of compatibility. Those principles state that the proposed use shall not significantly compromise, displace, impair or remove current or reasonably foreseeable agricultural operations on the

subject contracted parcel or parcels or on other contracted lands in the A-2 zoning district. The project as proposed is considered a Tier Two use. Within the A-2 zoning district, the County has determined Tier Two uses shall be evaluated on a case-by-case basis by the Planning Commission and/or Board of Supervisors to determine whether they are consistent with the principles of compatibility set forth in Section 21.20.045 of the County Code. Surrounding parcels in agricultural production that are also enrolled under the Williamson Act are adjacent to the project site on all sides and range in size from 3.4± acres to 296.7± acres and planted in row and forage crops, and almonds. It is not anticipated that the proposed project will impact agricultural operations on the project site or surrounding parcels.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2-40) zoning district and are required to be designed to physically avoid conflicts between agricultural and non-agricultural uses. General Plan Amendment No. 2011-01 – *Revised Agricultural Buffers* was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. The use of a dairy is included in the Agricultural Element's definition of "Agriculture" and considered to be permitted agricultural uses and not subject to agricultural buffer requirements. As this is a Tier Two use, if not considered people-intensive by the Planning Commission, the proposed project will also not be subject to agricultural buffers. As mentioned previously, existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. Therefore, staff believes the project can be considered low people-intensive, thus not subject to the County's Agricultural Buffer requirements.

The project will not physically divide an established community nor conflict with any habitat conservation plans.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

XII. MINERAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	

Discussion: The location of all commercially viable mineral resources in Stanislaus County has been mapped by the State Division of Mines and Geology in Special Report 173. There are no known significant resources on the site, nor is the project site located in a geological area known to produce resources.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

XIII. NOISE -- Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

Discussion: The Stanislaus County General Plan identifies noise levels up to 75 dB Ldn (or CNEL) as the normally acceptable level of noise for agricultural uses. The Stanislaus County General Plan identifies noise levels for residential or other noise-sensitive land uses of up to 55 hourly Leq, dBA and 75 Lmax, dBA from 7:00 a.m. to 10:00 p.m. and 45 hourly Leq, dBA and 65 Lmax, dBA from 10:00 p.m. to 7:00 a.m. Pure tone noises, such as music, shall be reduced by five dBA; however, when ambient noise levels exceed the standards, the standards shall be increased to the ambient noise levels. The closest sensitive receptors to the project site are two single-family dwellings located on the adjacent dairy to the east that will be served by the digester under this proposal (APN: 044-040-041). The dwellings are located approximately 233 feet and 547 feet across South Common Road from the area to be developed on the project site. The second closest receptor is a single-family dwelling located 600 feet from the project site area on a parcel to the northeast of the project area (APN 044-012-002). The site itself is impacted by noise generated by vehicular traffic on South Common and West Harding Roads and neighboring agricultural operations.

The site is not located within an airport land use plan. Impacts associated with noise are considered to be less than significant.

Mitigation: None.

References: Application information; Stanislaus County Noise Control Ordinance (Title 10); Stanislaus County General Plan and Support Documentation¹.

XIV. POPULATION AND HOUSING -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

Discussion: The site is not included in the vacant sites inventory for the 2016 Stanislaus County Housing Element, which covers the 5th cycle Regional Housing Needs Allocation (RHNA) or the draft 2023 6th cycle RHNA for the county and will therefore not impact the County's ability to meet their RHNA. No population growth will be induced, nor will any existing housing be displaced as a result of this project.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

XV. PUBLIC SERVICES --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Would the project result in the substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

Discussion: This project was circulated to all applicable school, fire, police, and public works departments and districts including Chatom Union School District and Turlock Unified School District, Turlock Rural Fire Protection District, Stanislaus County Sheriff's Office, and the Stanislaus County Public Works Department during the Early Consultation referral period and no concerns were identified with regard to public services. The County has adopted Public Facilities Fees, as well as Fire Facility Fees on behalf of the appropriate fire district, to address impacts to public services. School Districts also have their own adopted fees. All facility fees are required to be paid at the time of building permit issuance.

It is not anticipated that the project would substantially affect the level of service on West Harding or South Commons Roads. The project was referred to the Stanislaus County Department of Public Works, has requested conditions of approval to address driveway approaches installed according to Public Works' Specifications, restrictions on loading, parking, unloading within the County right-of-way. The developer will be required to install or pay for the installation of any signs and/or markings, if warranted. Additionally, Public Works has requested roadway dedications for South Commons Road, Bradbury Road, and South Faith Home Road which border the project site to the east, south and west. Currently, South Commons and Bradbury Roads are classified as 60-foot-wide local roads. The required half-widths of South Commons and Bradbury Roads are 30-feet west of the centerline of the roadway for South Commons Road and 30-feet north of the centerline for Bradbury Road. The existing right-of-way is only 20-feet west of the centerline for South Commons Road and 20-feet north of the centerline for Bradbury Road. The remaining 10-feet for both roads shall be dedicated as an irrevocable offer of dedication (IOD). South Faith Home Road is classified as an 80-foot major collector road. The required half-width east of the centerline is 40-feet. The existing right-of-way is only 20-feet east of the centerline. Public Works has requested that the remaining 20-feet east of the centerline be dedicated as an IOD. Conditions of Approval reflecting Public Works' requests and requirements will be added to the project.

The project site is located within the boundaries of Turlock Irrigation District (TID). The project site receives irrigated water from TID Lateral No. 5 canal. The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval; and that all applicable electrical requirements be adhered to pursuant to the District's standards. TID's comments will be addressed as conditions of approval for the project.

Mitigation: None.

References: Application information; Referral response from Turlock Irrigation District, dated March 25, 2025; Referral response from Stanislaus County Public Works Department, dated May 28, 2025; Stanislaus County General Plan and Support Documentation¹.

XVI. RECREATION --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Discussion: This project will not increase demands for recreational facilities, as such impacts typically are associated with residential development.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

XVII. TRANSPORTATION -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

Discussion: The project site has access to County-maintained South Commons Road, Bradbury Road, and South Faith Home Road. While County-maintained West Harding Road is near the project site, access to the road is prevented by the TID Lateral No. 5 canal which lies between the project site and West Harding Road.

As required by CEQA Guidelines Section 15064.3, potential impacts regarding Air Quality should be evaluated using Vehicle Miles Traveled (VMT). Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. The CEQA Guidelines identify vehicle miles traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. According to the same technical advisory from OPR, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less-than significant transportation impact. The proposed project will not exceed the screening criteria for VMT analysis with a total of 12 roundtrips (up to six truck trips traveling to and from the injection site) for off-loading of biogas per-day. As this is below the District's threshold of significance for vehicle and heavy truck trips, no significant impacts from vehicle and truck trips to air quality are anticipated.

It is not anticipated that the project would substantially affect the level of service on South Commons Road, South Faith Home Road or Bradbury Road. The project was referred to the Stanislaus County Department of Public Works, has requested conditions of approval to address driveway approaches installed according to Public Works' Specifications, restrictions on loading, parking, unloading within the County right-of-way. The developer will be required to install or pay for the installation of any signs and/or markings, if warranted. Additionally, Public Works has requested roadway dedications for South Commons Road, Bradbury Road, and South Faith Home Road which border the project site to the east, south and west. Currently, South Commons and Bradbury Roads are classified as 60-foot-wide local roads. The required half-widths of South Commons and Bradbury Roads are 30-feet west of the centerline of the roadway for South Commons Road and 30-feet north of the centerline for Bradbury Road. The existing right-of-way is only 20-feet west of the centerline for South Commons Road and 20-feet north of the centerline for Bradbury Road. The remaining 10-feet for both roads shall be dedicated as an irrevocable offer of dedication (IOD). South Faith Home Road is classified as an 80-foot major collector road. The required half-width east of the centerline is 40-feet. The existing right-of-way is only 20-feet east of the centerline. Public Works has requested that the remaining 20-feet east of the centerline be dedicated as an IOD. Conditions of Approval reflecting Public Works' requests and requirements will be added to the project.

Transportation impacts associated with the project are considered to be less than significant.

Mitigation: None.

References: Application information; Referral response from the Stanislaus County Department of Public Works, dated May 28, 2025; Governor's Office of Planning and Research Technical Advisory, December 2018; Stanislaus County General Plan and Support Documentation¹.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for the in subdivision (c) of Public Resource Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Discussion: It does not appear that this project will result in significant impacts to any archaeological or cultural resources. The project site is already improved with multiple buildings. In accordance with SB 18 and AB 52, this project was not referred to the tribes listed with the Native American Heritage Commission (NAHC) as the project is not a General Plan Amendment and no tribes have requested consultation or project referral noticing. While the site is already developed, if any resources are found during future construction, construction activities would halt until a qualified survey takes place and the appropriate authorities are notified.

No significant impacts to Tribal Cultural resources are anticipated to occur as a result of this project.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation¹.

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Discussion: Limitations on providing services have not been identified. The project site is not currently developed with an existing well or septic facilities.

There are no new wells or septic systems proposed as part of this request. If in the future the facility results in the formation of a new Public Water System, then the project site will be subject to all applicable rules, regulations and standards as discussed above in Section X – *Hydrology and Water Quality* Section of this document. A referral response received from DER requested that prior to issuance of a building permit or licenses to conduct business, the property owner shall submit certifications to DER that the property use does not constitute a public water system, and that prior to issuance of any grading or building permit, the applicant(s) shall submit a site plan showing the location of all water wells, in addition to the layout and design of both existing and proposed on-site wastewater treatment systems, including areas designated for future 100% expansion or replacement. Any proposed work to an existing or proposed on-site wastewater treatment systems shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks and be designed according to type and/or maximum occupancy of the proposed structure to the estimate waste/sewage design flow rate. As mentioned in Section X – *Hydrology and Water Quality*, DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. The building permit for the proposed digester was previously reviewed by DER, Public Works and the Building Permits Division. Building permits for the electrical upgrades and foundation for the equipment associated with the injection site have been applied for but will not be issued unless the request is approved for the Use Permit. Conditions of approval regarding DER and Public Works' standards will be applied to the project and will be required to be met prior to issuance of a building permit associated with this request.

The project site is located within the boundaries of the Turlock Irrigation District (TID). The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval; and that all applicable electrical requirements be adhered to pursuant to the District's standards. TID's comments will be addressed as conditions of approval for the project.

The project was also referred to PG&E and AT&T and no response has been received to date.

Impacts to utilities and services are considered to be less than significant.

Mitigation: None.

References: Application information; Referral response from DER – Environmental Health, dated April 8, 2025; Stanislaus County General Plan and Support Documentation¹.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation of maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The terrain of the site is relatively flat, and the site has access to two County-maintained roads. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Turlock Rural Fire Protection District. The project was referred to the District, and no comments have been received to date. California Building and Fire Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and burning embers. The building permit for the digester and associated equipment skid pad will be reviewed by the County's Building Permits Division and Fire Prevention Bureau to ensure all State of California Building and Fire Code requirements are met prior to construction. Wildfire risk and risks associated with postfire land changes are considered to be less-than significant.

Mitigation: None.

References: Application information; California Fire Code Title 24, Part 9; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation¹.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Discussion: The project site has a General Plan designation of Agriculture and zoning designation of General Agriculture with a 40-acre minimum (A-2-40) which allows dairies as a permitted agricultural use, unless a dairy is expanding and a new or modified permit, waiver, order, or waste discharge requirement is needed from the Regional Water Quality Control Board. In this case the dairies included in the project are existing and are not proposed to be expanded. The use of a covered digester and equipment to process dairy manure is considered to be an accessory use if it is serving the on-site dairy and no herd expansion is proposed. However, for this request, the proposed project includes the operation of an injection point for the on-site dairy use and for use by two off-site dairies. As part of this request, biogas from an on-site anaerobic dairy digester (Couco Creek Dairy) and two off-site digesters located at Blue Sky Dairy in Atwater, California, and JDS Ranch in Wasco, California, will be trucked to the project site and off-loaded into a PG&E natural gas pipeline on-site. The equipment to be utilized for the project will be located within a 159± square-foot enclosed metal structure. Due to the use of the injection hub for multiple dairies, discretionary approval is required to permit the operation as a Tier Two Use Permit. Within the A-2 zoning district, the County has determined that certain uses related to agricultural production are "necessary for a healthy agricultural economy." The County allows agriculture processing plants and facilities by obtaining a Tier Two Use Permit if specific criteria can be met and if specific findings can be made. Those findings include that the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity; that the use is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage; and that it will not create a concentration of commercial and industrial uses in the vicinity. There are limits to the number of employees that are involved in the operation under a Tier Two Use Permit; no more than ten full-time employees, or 20 seasonal employees are permitted to be involved in the operation. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County. The project will not create a concentration of commercial or industrial uses in the vicinity and does not appear to be detrimental to the health, safety, and general welfare of persons and property within the area. Off-loading of the biogas will occur seven days a week between the hours of 6:00 a.m. – 8:00 p.m. Existing dairy employees will operate and maintain the off-loading process for the biogas; no additional employees are anticipated as part of this request. The applicant anticipates 3-6 truck trips per-day associated with the project.

The project site is currently enrolled in California Land Conservation Act ("Williamson Act") Contract No. 76-2290. It is not anticipated that the proposed project will impact agricultural operations on the project site or the surrounding parcels that are also under contract and in agricultural production.

The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

It does not appear that this project will result in significant impacts to any archaeological or cultural resources. The project site has already been disturbed and planted in forage crops and improved with two lagoons for liquid manure waste storage, and one anaerobic digester that is currently being constructed. Standard conditions of approval regarding the discovery of cultural resources during the construction of the equipment shelter and injection hub resulting from this request will be added to the project.

The project will not physically divide an established community. The surrounding area consist of a fertilizer storage and manufacturing facility to the north; a dairy facility and ranchettes with single-family dwellings to the east; production agriculture to the south; and production agriculture and dairy facilities to the west. Any development of the surrounding area would be subject to the permitted uses of the A-2 Zoning District or would require additional land use entitlements and environmental review. Additionally, the majority of the surrounding parcels located within Stanislaus County are restricted by Williamson Act Contracts and are limited to the uses found to be compatible with the Williamson Act. Any uses beyond those uses permitted in the A-2 zoning district would require a General Plan Amendment and rezoning of the property which would be evaluated through additional environmental review which would take into consideration impacts from the loss of farmland and the potential for farmland conversion and cumulative impacts to the surrounding area. Any additional request for expansion for the agricultural service establishment under this request, may be subject to further land use entitlement review.

The proposed project will generate a low amount of vehicle trips with a total of twelve round-trip truck trips per-day. As this is below the threshold of significance for vehicle and heavy truck trips as discussed in Section XVII - *Transportation*, no significant impacts from the one vehicle trip to transportation are anticipated.

Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area.

Mitigation: None.

References: Initial Study; Stanislaus County General Plan and Support Documentation¹.

¹Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. **Housing Element** adopted on April 5, 2016.

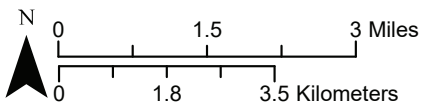
CUOCO CREEK

UP
PLN2025-0011

AREA MAP

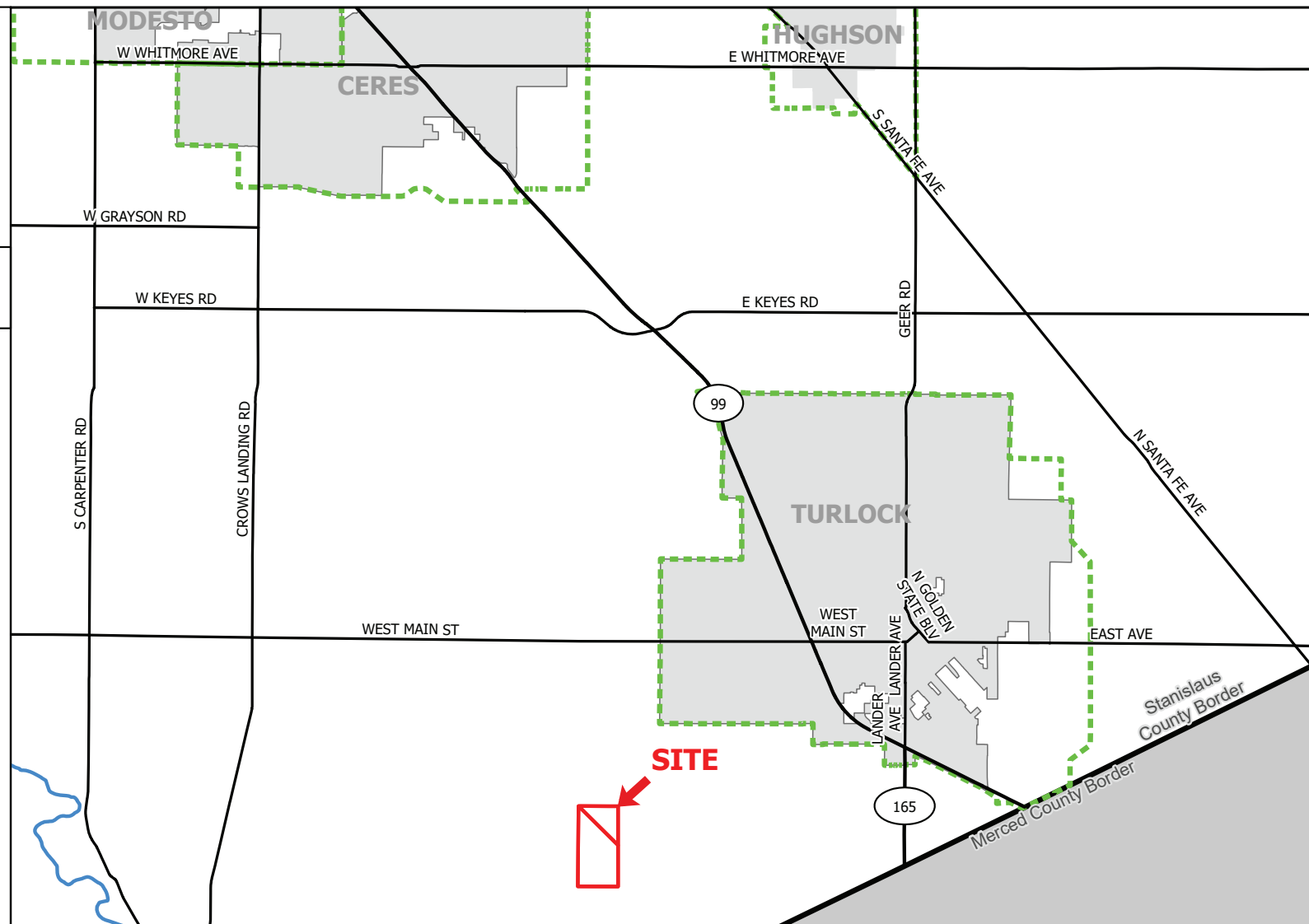
LEGEND

-  Project Site
-  Sphere of Influence
-  Highway
-  Major Road
-  River



Source: Planning Department GIS

Date Exported: 6/5/2025



CUOCO CREEK


**UP
PLN2025-0011**

GENERAL PLAN MAP

LEGEND


 Project Site

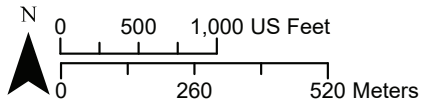
 Parcel

 Street

 Canal

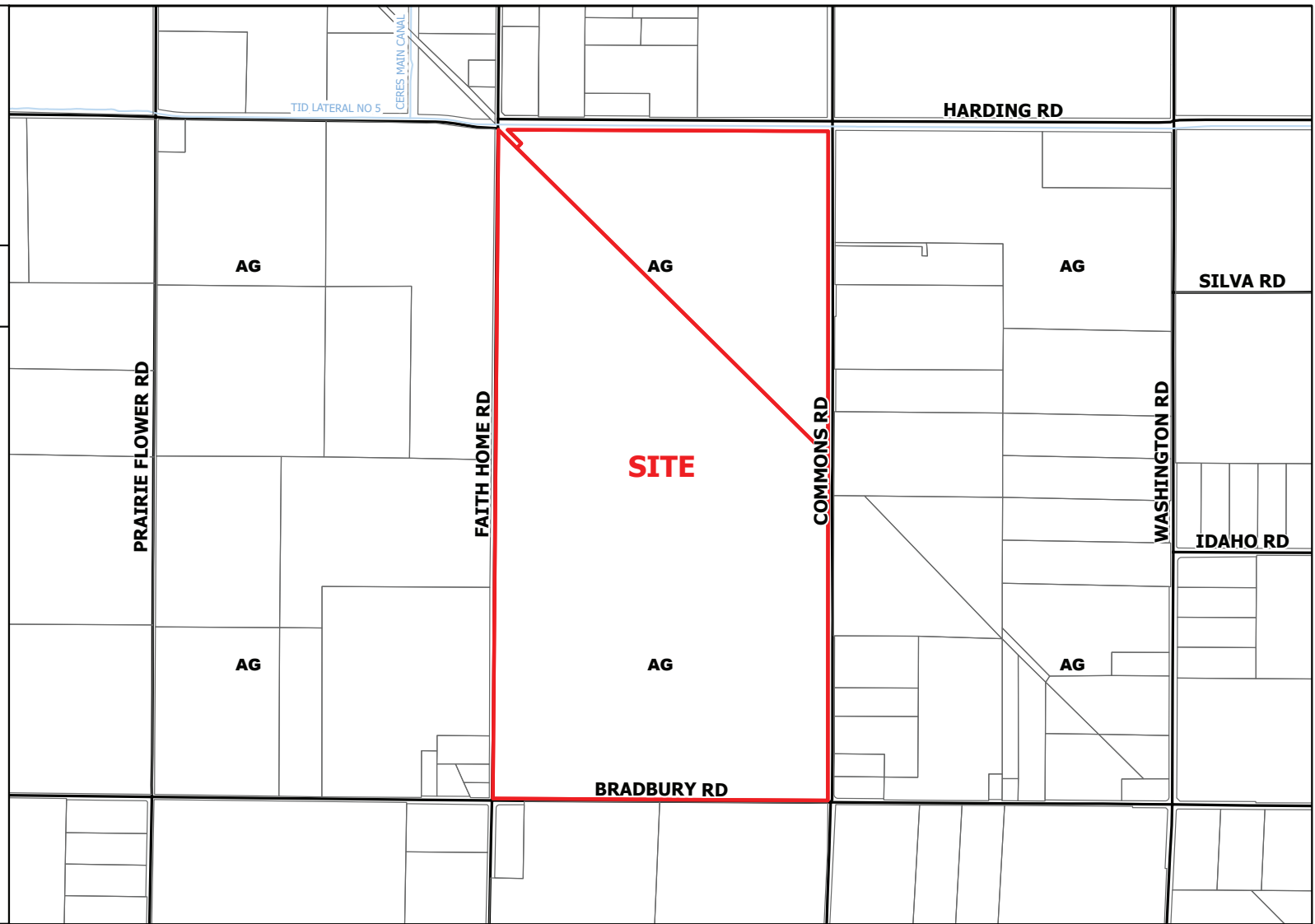
General Plan

 Agriculture (AG)



Source: Planning Department GIS

Date Exported: 6/5/2025







CUOCO CREEK



**UP
PLN2025-0011**

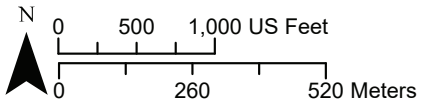
ZONING MAP

LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal

Zoning Designation

-  General AG 40 Acre (A-2-40)
-  Planned Development (P-D)



Source: Planning Department GIS

Date Exported: 6/5/2025







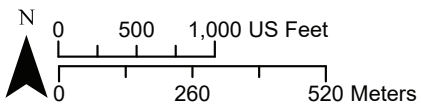
CUOCO CREEK

UP
PLN2025-0011

2023 AERIAL AREA MAP

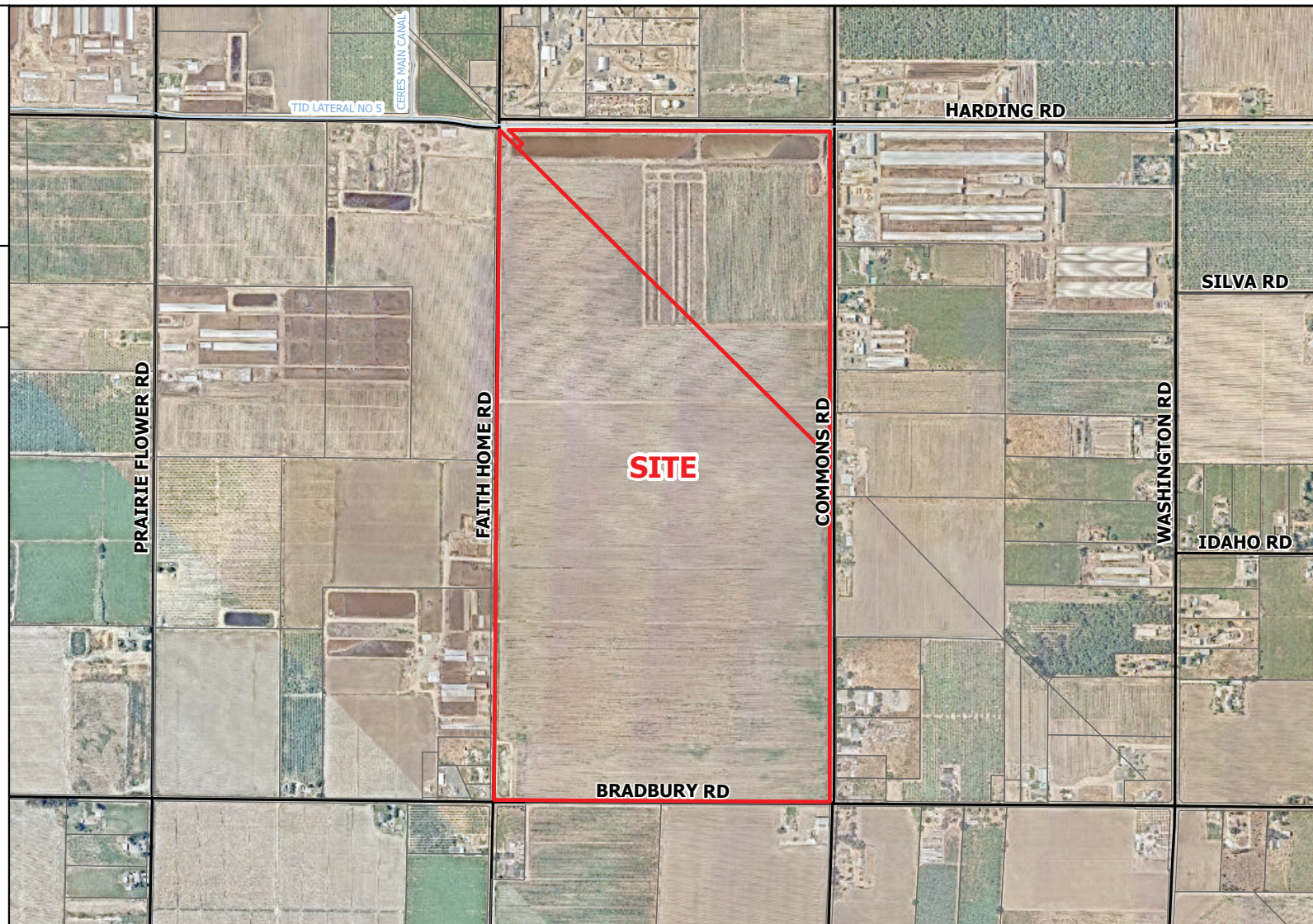
LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 6/5/2025







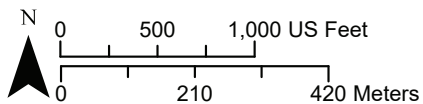
CUOCO CREEK

UP
PLN2025-0011

2023 AERIAL SITE MAP

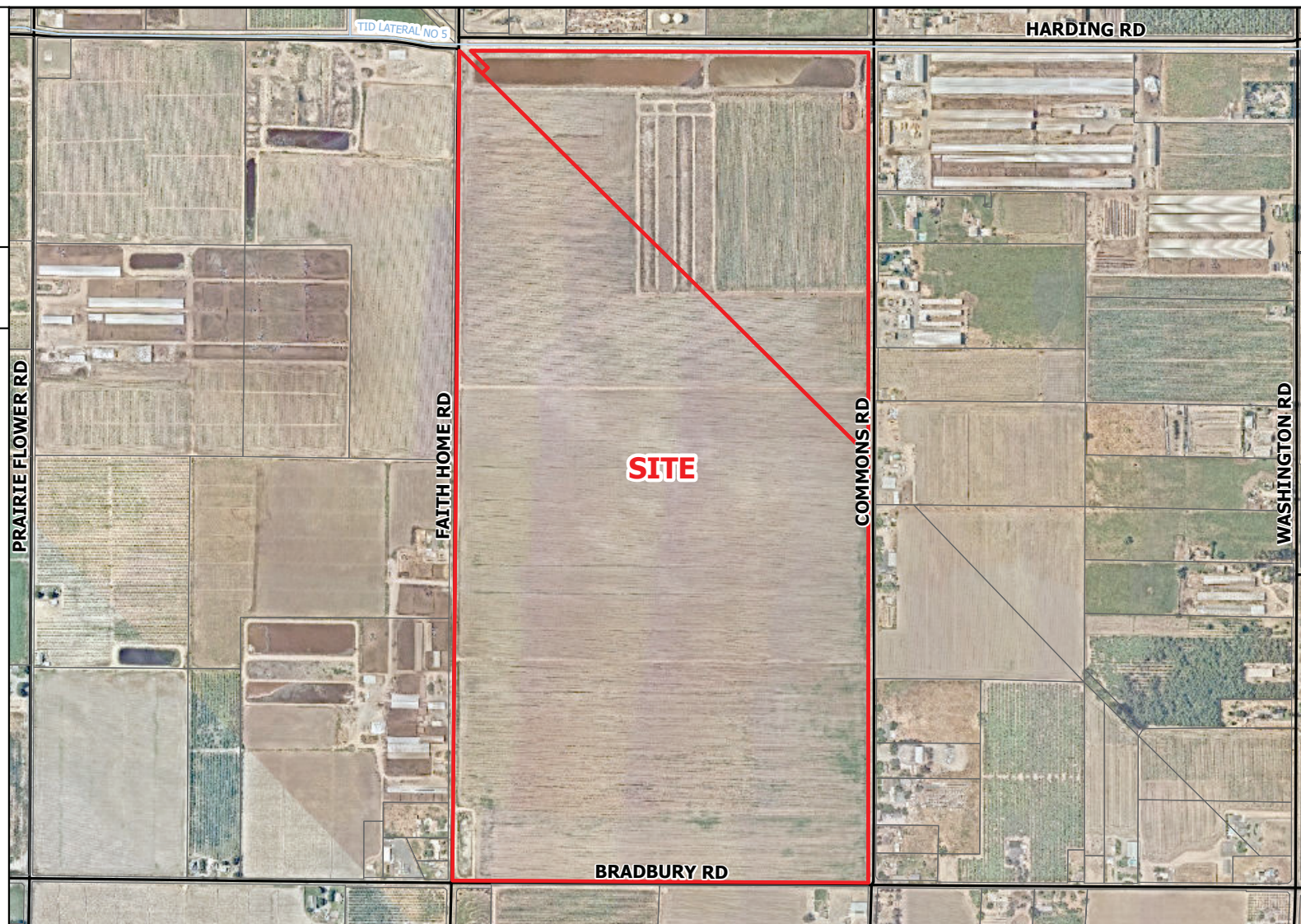
LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 6/5/2025








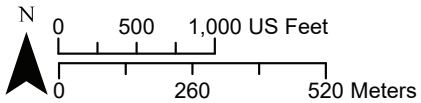
CUOCO CREEK

**UP
PLN2025-0011**

ACREAGE MAP

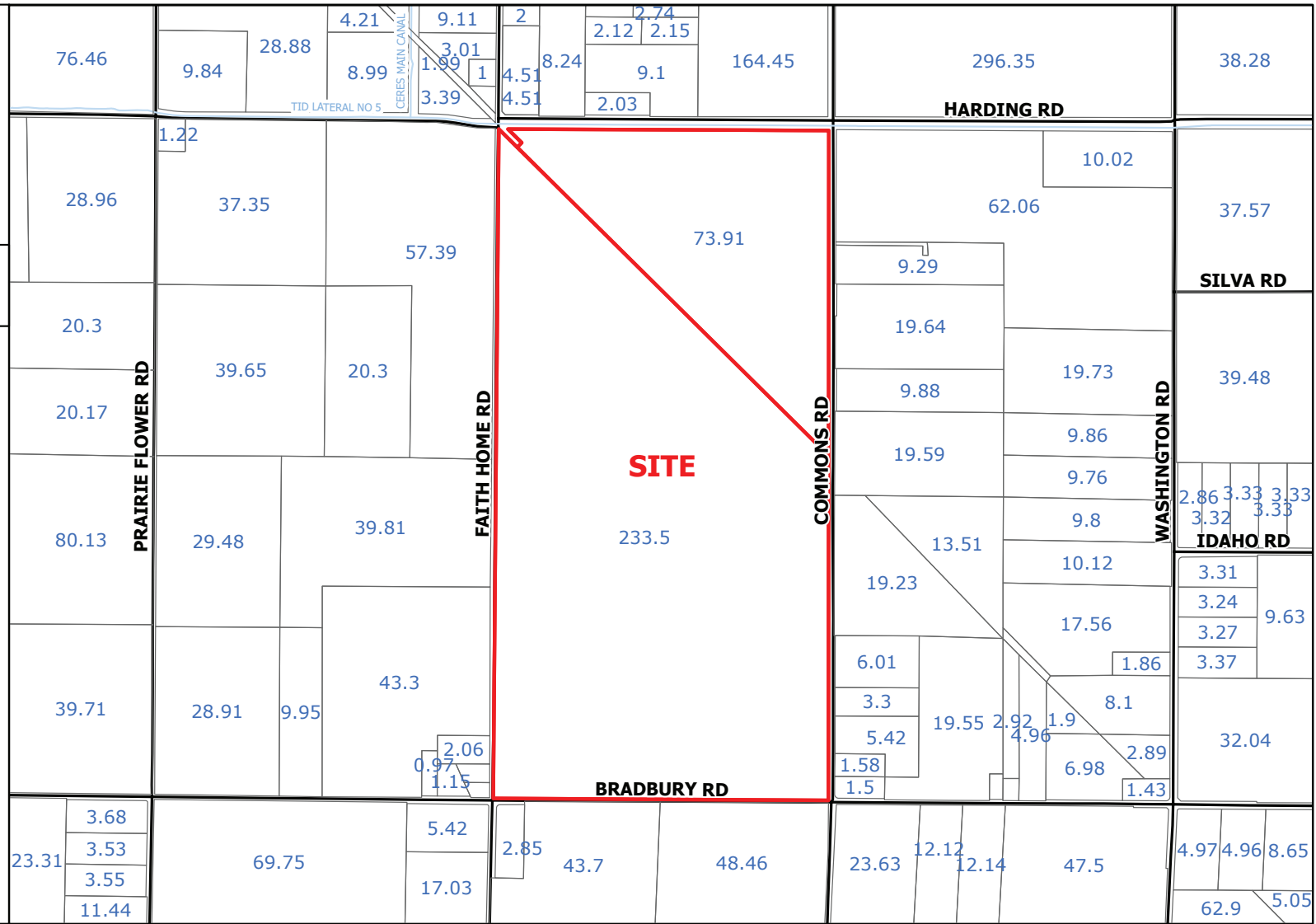
LEGEND

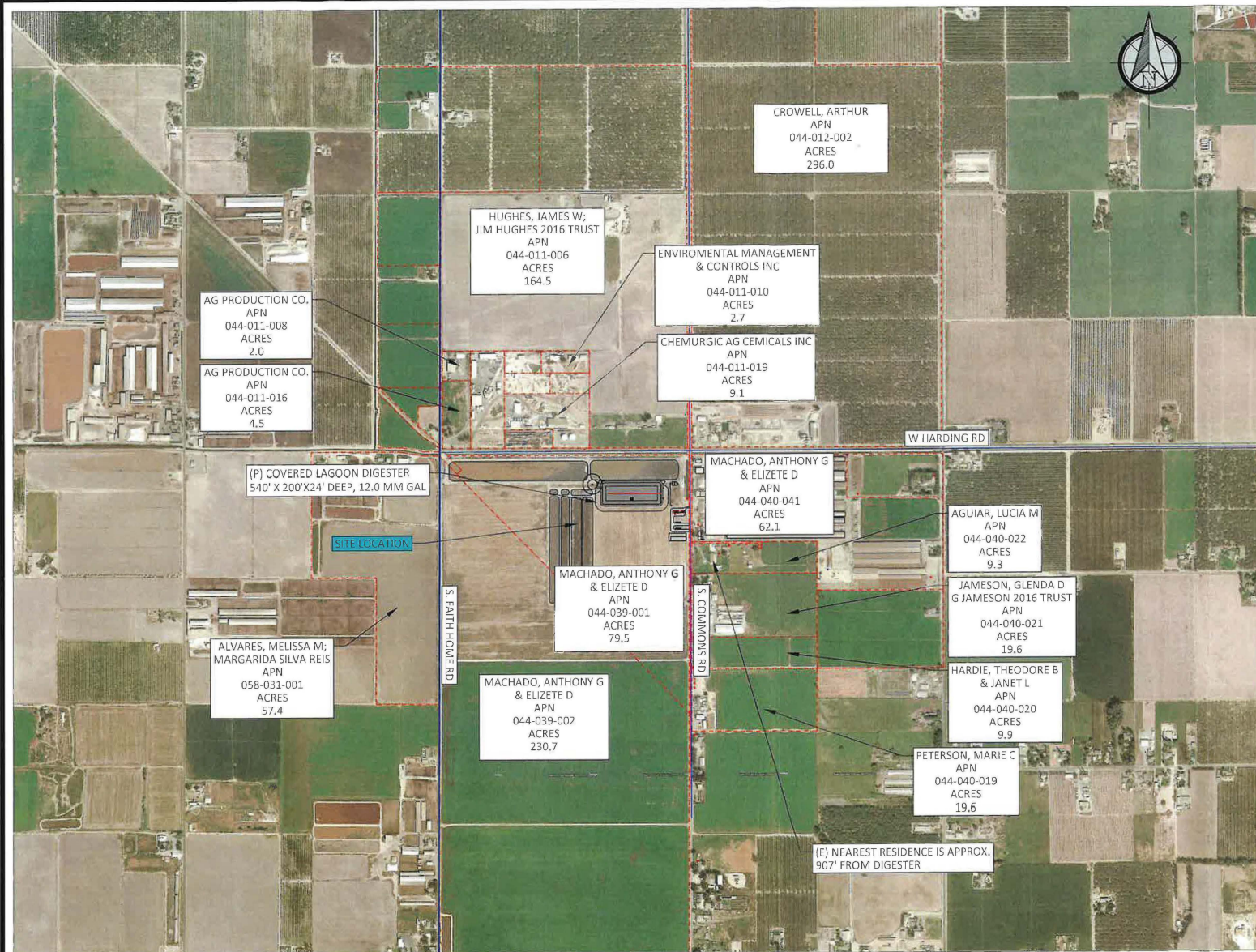
-  Project Site
-  Parcel
-  Acres
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 6/5/2025





Legend

(P) PROPOSED (E) EXISTING

APN BOUNDARY

ROADS

(E) PG&E NATURAL GAS PIPELINE

VICINITY MAP

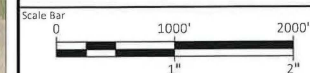


Firm Address

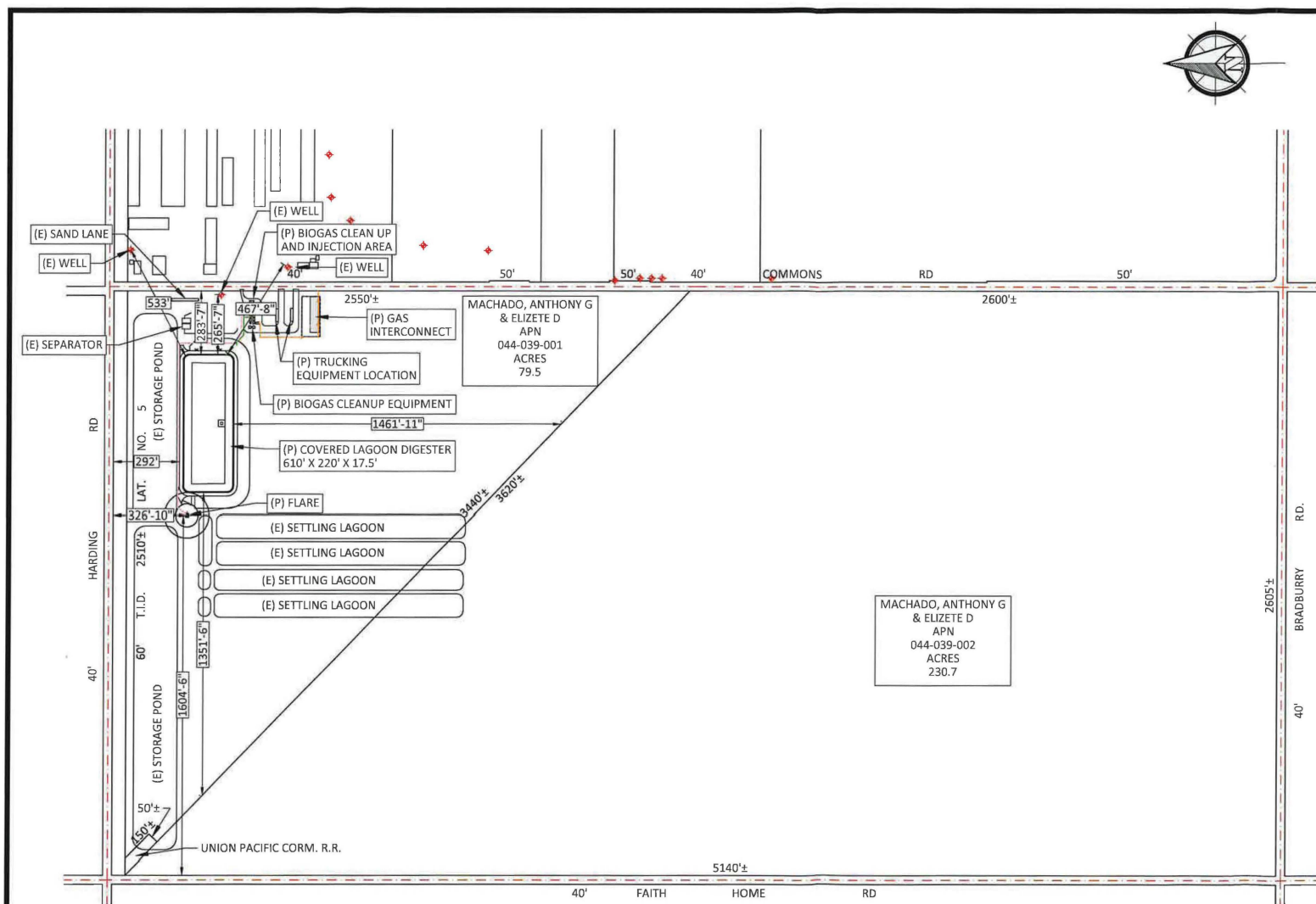
1730 South Street
Redding, CA, 96001

Project Name and Address

Couco Creek Dairy
3303 S. Washington Rd.
Turlock, Ca 95380



Drawn By RG	Date 4/30/24	Drawing Version 1.04
Sheet Size 11" x 17"	Sheet # 1 of 2	Sheet Name S-1



Legend

APN BOUNDARY



DOMESTIC WELL

DIGESTER SITE PLAN

MAAS
ENERGY WORKS

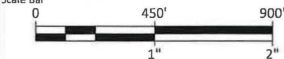
Firm Address

1730 South Street
Redding, CA, 96001

Project Name and Address

Couco Creek Dairy
3303 S. Washington Rd.
Turlock, Ca 95380

Scale Bar



Drawn By

Date	4/30/24
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Drawing Version	1.04
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Sheet Size

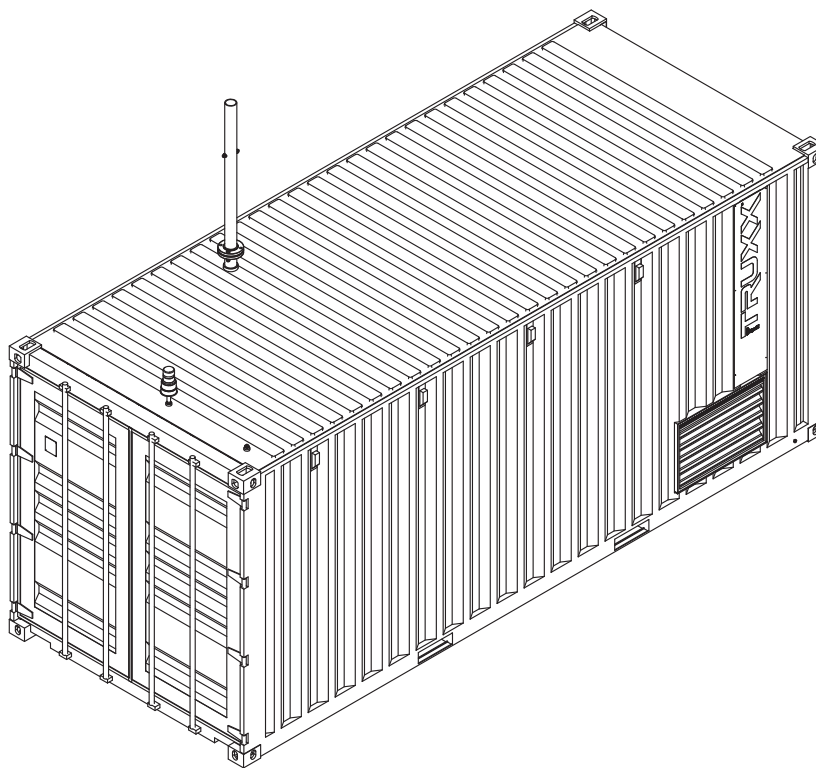
Sheet #

Sheet Name

11" x 17"


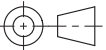
2 of 2

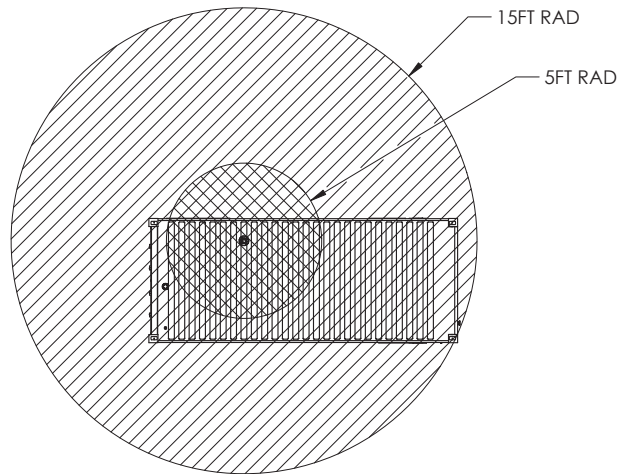
S-2



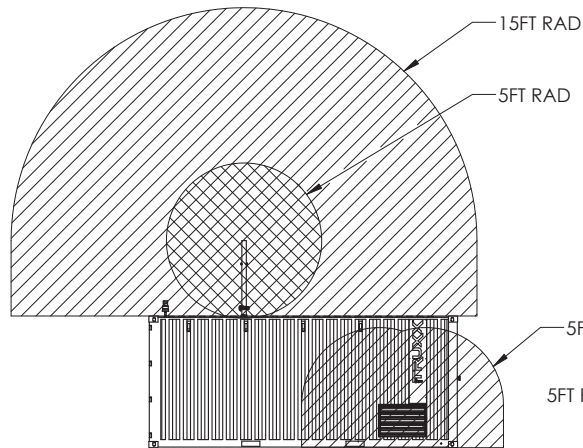
NOTES:

1. POWER - 480V/3/60HZ
2. INLET RATING
MAWP: 4500 PSI @ 100 °F
MDMT: -70 F @ 4500 PSIG
3. HIGH PRESSURE HEAT EXCHANGER
SA: 4.8 FT² EACH
MAWP: 4500 PSI @ 300 °F
4. ESTIMATED OPERATING WEIGHT - 11,250 LBS
5. OUTLET RATING
MAWP: 1440 PSI @ 100 °F
MDMT: -20 F @ 1440 PSIG
6. OUTLET PRESSURE: 800-900 PSIG NOMINAL
7. OUTLET TEMPERATURE: 50 °F NOMINAL
8. SUITABLE FOR OUTSIDE INSTALLATION
9. TO BE INSTALLED UPON AND LAGGED TO CONCRETE PAD WITH RE-BAR OR WIRE MESH REINFORCEMENT
10. ALL DIMENSIONS ARE IN INCHES
11. AREA CLASSIFICATIONS PER AGA CATALOG #XL1001

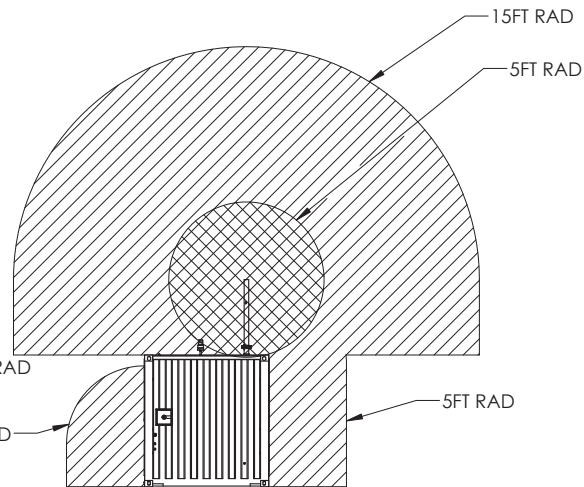
Drawn By:	TAG	THIRD ANGLE PROJECTION	TOLERANCES UNLESS OTHERWISE SPECIFIED X ± 0.10 .XX ± 0.030 .XXX ± 0.010 ANGLE ± 1° FRACTIONS ± 1/4"	 ALGAS-SDI.COM	
Approved By:					
Date:	10/8/2024				
DO NOT SCALE DRAWING		Size: B	Part No.: 10148-64838	Job No.: 64838E	
INTERPRET THIS DRAWING IN ACCORDANCE WITH LATEST REVISION AND ADDENDA OF ANSI/ASME Y14.5		Title: TRUXX 36E EQUIPMENT DRAWING			
THIS DRAWING IS PROPRIETARY AND CONFIDENTIAL AND SHALL NOT BE REPRODUCED OR USED IN ANY MANNER DETRIMENTAL TO ALGAS-SDI'S INTERESTS. ALL RIGHTS RESERVED. © COPYRIGHT ALGAS-SDI		Scale: 1:36 AND NOTED	Dwg. No.: JP16569C	Sht. No.: 1 of 4	Rev.: A



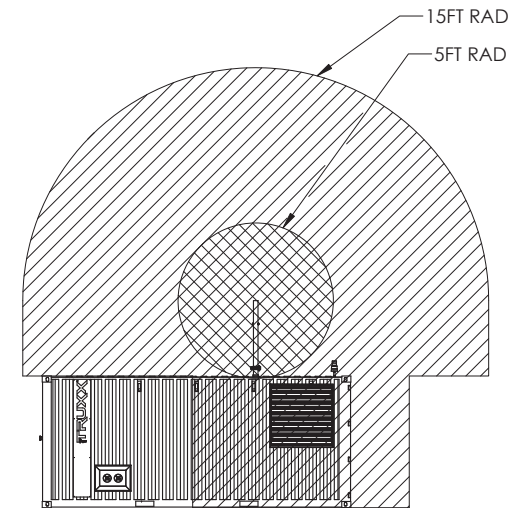
TOP VIEW



RIGHT VIEW



END (INLET) VIEW

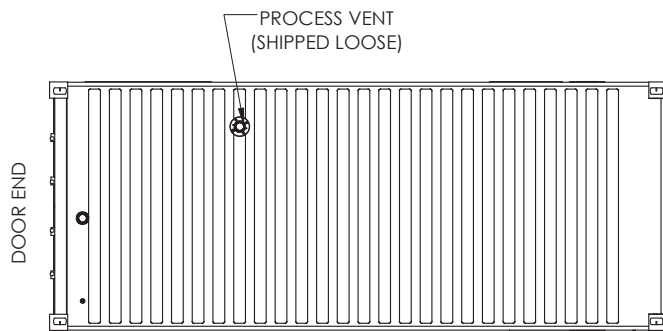


LEFT (OUTLET) VIEW

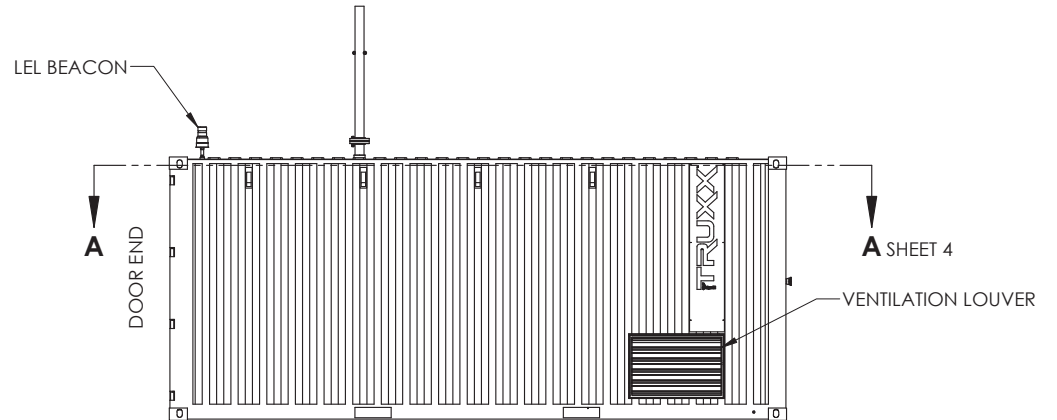
-  CLASS 1 DIVISION 2 GROUP D AREA
-  CLASS 1 DIVISION 1 GROUP D AREA

NOTE: INTERIOR OF SKID IS CLASS 1 DIVISION 2

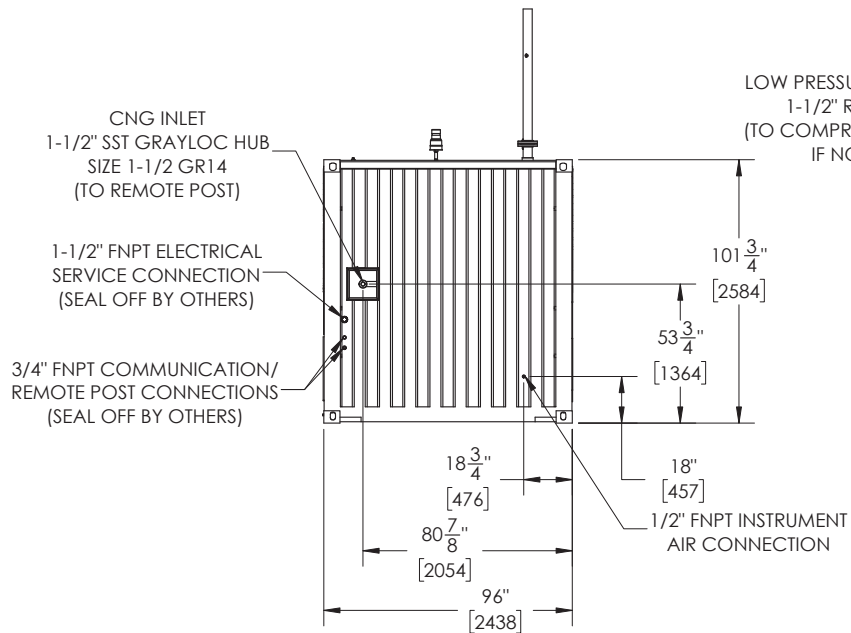
Size: B	Part No.: 10148-64838	Job No.: 64838E
Title: TRUXX 36E EQUIPMENT DRAWING		
Scale: 1:96 AND NOTED	Dwg. No.: JP16569C	Sht. No.: 2 of 4
		Rev.: A



TOP VIEW



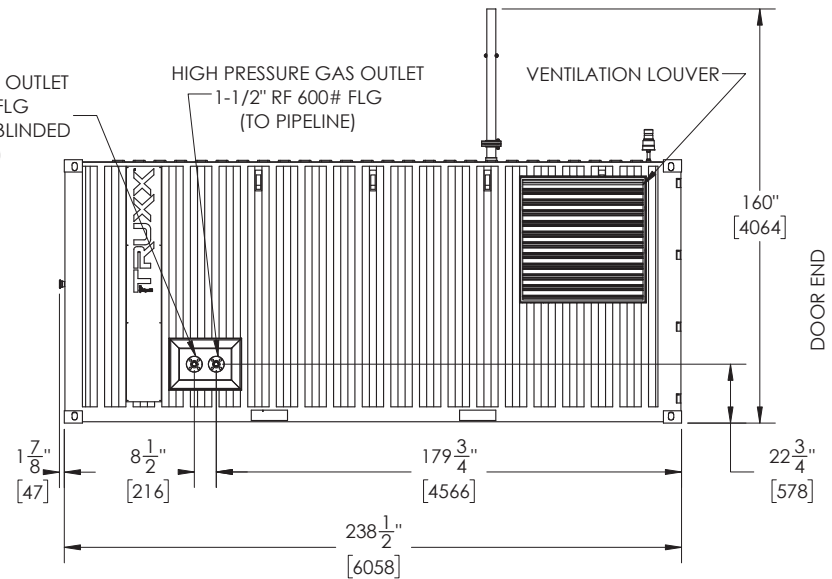
RIGHT VIEW



END (INLET) VIEW

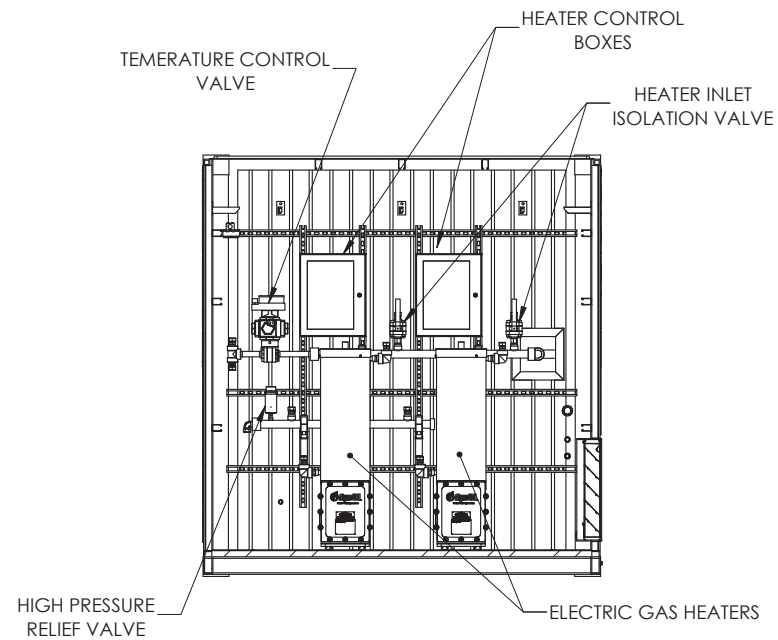
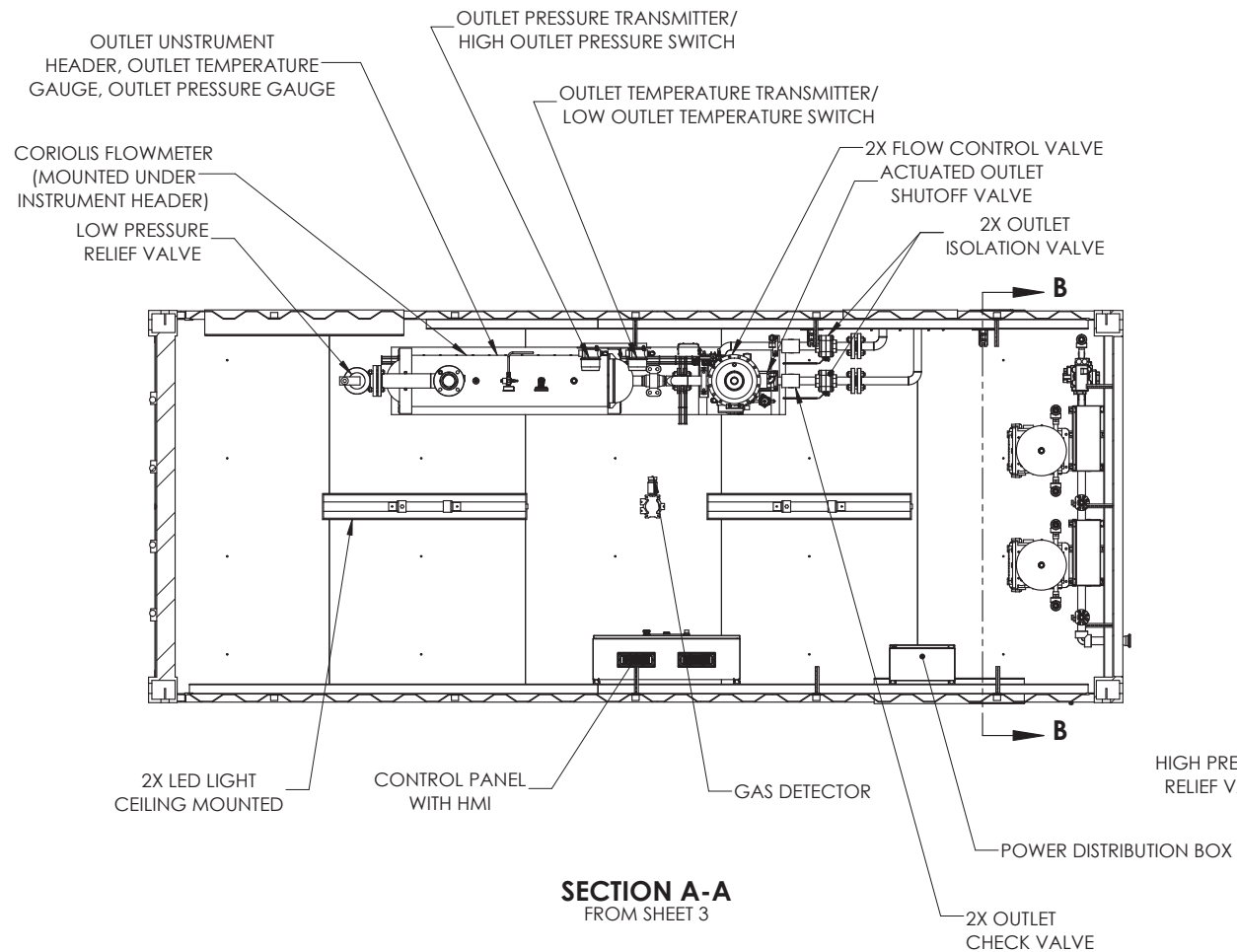
LOW PRESSURE GAS OUTLET
1-1/2" RF 600# FLG
(TO COMPRESSOR, BLINDED
IF NOT USED)

HIGH PRESSURE GAS OUTLET
1-1/2" RF 600# FLG
(TO PIPELINE)



LEFT (OUTLET) VIEW

Size: B	Part No.: 10148-64838	Job No.: 64838E
Title: TRUXX 36E EQUIPMENT DRAWING		
Scale: 1:48 AND NOTED	Dwg. No.: JP16569C	Sht. No.: 3 of 4
		Rev.: A



Size: B	Part No.: 10148-64838	Job No.: 64838E
Title: TRUXX 36E EQUIPMENT DRAWING		
Scale: 1:30 AND NOTED	Dwg. No.: JP16569C	Sht. No.: 4 of 4
		Rev.: A